

## Clark, Sarah

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**From:** Daugavietis, Andre  
**Sent:** Friday, August 24, 2018 2:02 PM  
**To:** Kushner, Adam M.; Graae, Hannah M.  
**Cc:** Chatfield, Ethan; Clark, Sarah  
**Subject:** RE: River City Diesel - CBI

adam: the rubber just hit the road here. we have received a foia request which encompasses your client's response. please promptly provide substantiation for any actual cbi in the response. please let us know how quickly you can get that to us.

thanks -andre

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**From:** Kushner, Adam M. [mailto:[adam.kushner@hoganlovells.com](mailto:adam.kushner@hoganlovells.com)]  
**Sent:** Monday, July 23, 2018 12:02 PM  
**To:** Daugavietis, Andre <[daugavietis.andre@epa.gov](mailto:daugavietis.andre@epa.gov)>  
**Cc:** Graae, Hannah M. <[hannah.graae@hoganlovells.com](mailto:hannah.graae@hoganlovells.com)>; Chatfield, Ethan <[chatfield.ethan@epa.gov](mailto:chatfield.ethan@epa.gov)>; Clark, Sarah <[clark.sarah@epa.gov](mailto:clark.sarah@epa.gov)>  
**Subject:** RE: River City Diesel - CBI

Hi Andre:

Apologies.

Hannah and I are happy to work with you in connection with the CBI claim.

Hannah will take the lead on doing that.

Sincerely,

Adam

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**From:** Daugavietis, Andre [mailto:[daugavietis.andre@epa.gov](mailto:daugavietis.andre@epa.gov)]  
**Sent:** Monday, July 23, 2018 11:10 AM  
**To:** Kushner, Adam M.  
**Cc:** Graae, Hannah M.; Chatfield, Ethan; Clark, Sarah  
**Subject:** RE: River City Diesel - CBI

adam: in case the below msg. missed you, here it is again. please let me know if you'd like to discuss. -andre

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**From:** Daugavietis, Andre  
**Sent:** Thursday, July 05, 2018 2:18 PM  
**To:** 'Kushner, Adam M.' <[adam.kushner@hoganlovells.com](mailto:adam.kushner@hoganlovells.com)>  
**Cc:** Graae, Hannah M. <[hannah.graae@hoganlovells.com](mailto:hannah.graae@hoganlovells.com)>; Chatfield, Ethan <[chatfield.ethan@epa.gov](mailto:chatfield.ethan@epa.gov)>; Clark, Sarah <[clark.sarah@epa.gov](mailto:clark.sarah@epa.gov)>  
**Subject:** RE: River City Diesel - CBI

adam: thanks to river city for their information response. we have reviewed it and there are several areas on which we will follow up, including the "quickbooks" issue. we will be in touch regarding the follow-up over perhaps the next few weeks.

first we want to address the extremely broad cbi claim that the company made with the response. we are happy to treat actual cbi with all due protection, but its burdensome to treat general information and non-confidential documents as cbi. a broad cbi claim will even make it harder for us to communicate with you about information relating to the case.

are you willing to work with the company to hone its cbi claim to information that it actually maintains as confidential?

regards -andre

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